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9 Attorneys for Plaintiffs
10 HINDU AMERICAN FOUNDATION;
11 SAMIR KALRA; MIHIR MEGHANI;
12 SANDEETHA SHANKAR; DILIP AMIN; SUNDAR IYER;
13 RAMANA KOMPELLA; AND DOES ONE TO THREE

14
15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE EASTERN DISTRICT OF CALIFORNIA

17 HINDU AMERICAN FOUNDATION, INC.,
18 a Florida Not For Profit Corporation; Samir
19 Kalra Mihir Meghani; Sangeetha Shankar;
20 Dilip Amin, Sundar Iyer, Ramana Kompella
as individuals; and Doe Plaintiffs One to
Three

Case No. 2-22-CV-01656-DAD-JDP

**DECLARATION OF DILIP AMIN ISO
MOTION FOR JOHN DOES ONE
THROUGH THREE TO PROCEED
UNDER PSEUDONYM**

21 Plaintiff,

22 vs.

23 KEVIN KISH, an individual, in his official
24 capacity as Director of the California Civil
Rights Department; and DOES 1 - 50,
inclusive,

Defendants.

Date: November 21, 2023

Time: 1:30 p.m.

Judge: Dale A. Drodz

Date Action Filed: September 20, 2022

1 I, DILIP AMIN, declare as follows:

2 1. I am a person of South Asian descent and a practicing Hindu in California. I am a
3 United States Citizen and have lived in California since 2011.

4 2. I am a devout Hindu and actively involved in several religious and cultural Hindu
5 and Indian organizations throughout the San Francisco Bay Area. I also participate in a number
6 of interfaith activities. I believe that prejudice or bigotry against anyone contradicts my
7 understanding of Hindu teachings about God's presence in all of existence. This teaching
8 imposes a duty on all of us to treat people for their inherent and equal worth.

9 3. The California Civil Rights Department has tried to define Hindu beliefs and has
10 defamed my religion by taking the position that the horrors of a caste system, is an inherent part
11 of Hinduism. I learned about the CRD's case against Cisco in an interfaith email group I am a
12 member to.

13 4. The CRD has further falsely tied anyone practicing Hinduism to engaging in caste
14 discrimination. This is false and dismisses me as a person of South Asian descent practicing
15 Hindu. After reading the email in my interfaith email group, and going to Hindu temple that
16 same day, I became depressed for several days and did not know where or how to even start in
17 defending my faith and my identity.

18 5. While I am accustomed to religious ignorance and animosity, I was shocked to
19 read about the CRD's disparaging depiction of Hinduism. I know many Hindus who expressly
20 disagree with the CRD's characterization, and like me, they have told me that it has caused them
21 significant harm in all aspects.

22 6. As a founder of the Hindu Speakers Bureau, I speak at different schools about
23 Hinduism. I now have serious anxiety whenever I get a question about common stereotypes
24 about India and Hinduism, because the government agency, which is tasked with ensuring all of
25 our safety and to be treated fairly and equally has broadly portrayed Hinduism as mandating
discriminatory practices as a matter of religious belief.

26 7. The CRD's actions have caused me significant emotional and spiritual harm. The
27 public speaking that I used to enjoy has become demoralizing and a painful experience over the
28

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1 last two years because of the volumes of media coverage the CRD generated over its case.

2 8. The CRD's actions have caused me embarrassment and has made me feel that
3 others are judging me and ostracizing me because of how I look and what my religious beliefs
4 are.

5 9. When I talked to my adult sons about the CRD's actions, I sensed that they
6 believed what the CRD was saying about Hinduism and Hindus over what I had imparted to
7 them. I further had a conversation with my wife about why we even came to the United States,
8 and whether losing our religious heritage was the price to pay for moving here.

9 10. I further fear that my adult sons could become the target of the CRD, or others,
10 much in the way the two Indian origin engineers at Cisco Systems did, and a caste assigned to
11 them because of their Indian and Hindu heritage. I also worry about my future grandchildren
12 and great-grandchildren, who may feel the need to turn their backs on their heritage or denounce
13 their heritage because of shame or disgust.

14 I declare under penalty of perjury under the laws of the United States that the above is
15 true and correct. Executed on October 4, 2023, at kyoto, Japan.

16 
17 DILIP AMIN